

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                    )  
                                  ) CASE NO: C-1-00-0899  
vs.                            )  
                                  )  
ROSE M. SEAY,                ) JUDGE WEBER  
aka ROSE MARIE SEAY,        ) MAGISTRATE JUDGE NOVOTNY  
SSN: XXX-XX-1908             )  
Defendant,                    )  
                                  )  
and                            )  
                                  )  
Cincinnati Children Hospital Medical Center )  
                                  )  
                                  )  
Garnishee.                    )

**APPLICATION FOR A WRIT OF CONTINUING GARNISHMENT**

Now comes the United States of America by its representative the United States Attorney for the Southern District of Ohio and for its cause of action alleges:

1. Plaintiff, United States of America, pursuant to Title 28 U.S.C. §3205 (b)(1), requests the issuance of a Writ of Continuing Garnishment against certain property of the Defendant, Rose M. Seay, also referred to as "debtor" or "judgment debtor" which is (or may become) in the possession, custody or control of Cincinnati Children Hospital Medical Center, Garnishee herein, for satisfaction of the monies owed by said Defendant, to the United States of America upon the judgment entered against the Defendant in the above-captioned case.

2. This debt arises from the January 22, 2001 judgment entered in favor of the Plaintiff against Defendant in Civil Action No. C-1-00-0899. The amount of said judgment debt that remains unpaid and due and owing is: \$12,146.18 (\$11,828.70 principal and \$317.48 interest) as of December 17, 2003, with additional interest accruing thereafter at the rate of 4.85

percent per annum. Plaintiff further requests that it be allowed to recover as part of this garnishment, a surcharge of ten percent (10%) of the amount of the currently outstanding debt pursuant to 28 U.S.C. § 3011(a).

3. Defendant's last known address is: 517 Hale Avenue, Apt. 5, Cincinnati, OH 45229-3140.

4. Not less than 30 days has elapsed since demand for payment of the above stated debt was made upon debtor. The last demand notice for payment was October 23, 2003. Since that time the judgement debtor has failed to pay the amount due.

5. The Garnishee is believed to have possession of property (including but not limited to nonexempt disposable earnings), in which the judgment debtor has a substantial nonexempt interest, and will owe the money or property to the judgment debtor.

6. The name and address of the Garnishee or its authorized agent is:

Cincinnati Children Hospital Medical Center  
3333 Burnet Ave.  
Cincinnati, OH 45229-3026

The requirements of Title 28 U.S.C. § 3205 (b) having been satisfied, Plaintiff, United States of America hereby requests the issuance of a Writ of Continuing Garnishment.

Respectfully submitted,

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